

HEARING DATE: November 1st at 10 AM EST

OBJECTION DEADLINE: October 27th at 4pm EST

UNITED STATES BANKRUPTCY COURT Chapter 11 Case No. 22-10964 (MG)

SOUTHERN DISTRICT OF NEW YORK (Jointly Administered)

In re CELSIUS NETWORK LLC, *et al*¹,

DANIEL A. FRISHBERGS' AMENDED MOTION TO COMPEL
INSIDER CLAWBACKS BY THE DEBTORS²/UCC³

INTRODUCTION

After significant analysis of the court docket, and other sources of information such as the bankruptcy code and online resources, I, Daniel A. Frishberg, a Celsius Network LLC Creditor⁴, have come to the conclusion that the assets that have been withdrawn by insiders (such as Alexander Mashinsky and his wife/daughter) at an astonishing rate. These assets must be clawed back in accordance with the bankruptcy code (see 11 U.S.C. § 547).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

² Or in the case of conflicts, the various conflict counsel's.

³ Or in the case of conflicts, the various conflict counsel's.

⁴ That is what I have been classified as, but I dispute this.

This is a quite unusual request coming from me, a *pro se filer*, and not the UCC/Debtor's/US Trustee/various regulators. What I think is more unusual, however, is that no one seems to have attempted clawbacks or filed motions compelling the debtors to begin the clawbacks given that we are dealing with cryptocurrency, which is incredibly easy to hide and steal. It is essential that these clawbacks take place as soon as humanly possible. Quite frankly it is likely already too late to recover significant assets as they have likely already either been spent, hidden, laundered or dissipated⁵ in other ways. These assets are now likely **irrecoverable** due to the massive **negligence** of the Debtors, the Debtors counsel (and potentially the UCC, and UCC's counsel) and, as well as any and all consultants, advisors, financial advisors and legal counsels including conflict counsel etc. It is shocking that these clawbacks did not happen months ago.

BREACH OF FIDUCIARY DUTY/NEGLIGENCE/POTENTIAL MALPRACTICE

What is clear, is the lack of any urgency/any action at all on the part of the Debtors and various legal counsels/financial advisors/consultants etc, is a clear breach of their fiduciary duties. The Debtors counsel was correct at the 10/20/2022 hearing, they, as legal counsel for the Debtors, do not have a **direct** fiduciary duty to creditors (unlike the UCC, who does). But the Debtors themselves do, and they have breached those duties numerous times, not only did they breach it by not sufficiently cutting costs, not commencing **any** insider clawbacks; but they also breached their duties by attempting to sell assets before the examiner's report came out, and before it has even been determined if they own large portions of those assets. If the sale (which they must have known would not have likely been allowed to proceed) had gone through, it

⁵ For more information, go to "*Dissipation Of Funds/Potential Money Laundering*".

would have severely reduced the recovery to creditors. The Debtors have a fiduciary duty to maximize the recovery for the *creditors*; and **not** maximize the payments to *lawyers and consultants/executives*. By moving the sale, the Debtors (and their counsel) have cost the estate unnecessary additional costs. The Debtors (and their counsel) once again breached their fiduciary duties and committed negligent acts by not only failing to commence clawbacks, but by actively delaying my motions to compel them to both commence clawbacks, and cut costs.

The UCC **does** have a fiduciary duty to all unsecured creditors. They have *potentially* breached it by not only failing to adequately force the Debtors to sufficiently cut costs, and commence clawbacks; but they have also failed to start clawbacks themselves. To make matters even worse, the UCC (along with the Debtors), directly opposed my motions being heard on an expedited basis, and delayed the motions to the 1st of November, which will cost the estate over 20 million dollars (in *direct* costs, not including the **vast** legal/advisor/consultant fees). They also (highly likely) billed the estate for actions that they took, which directly harmed it. Not only did they harm the estate by delaying my motions, they harmed the estate further by charging them, for actions that directly harm it, and the recovery for creditors. I *believe* this constitutes a **breach** of their fiduciary duty.

The Debtors, any and all financial advisors/consultants/legal teams, and *potentially* the UCC/UCC Legal Counsel, have been negligent in their duties to creditors/the estate. They have failed to cut costs to a sustainable number, a perfect example of this is: the Debtors pushing a plan to mine Bitcoin; which they are currently doing, at a over *\$14,000,000 loss per month*. They are also selling those mined Bitcoins, effectively **throwing away** over *14 million dollars*

for a yet unknown reason. Who in their right minds would effectively set *\$14 million* on fire? All of these (very expensive) lawyers/consultants/financial advisors have yet to commence a single insider clawback action (in the over 4 months since the bankruptcy petition has been filed). This all leads to significant damage to creditors, because not only are we being harmed, but we are also paying the people who are harming us *millions of dollars*. The Debtors do not have a plan, as the US Trustee pointed out at the 10/20/2022 hearing, their so called plan keeps changing. It seems to me (and most creditors) that the only goal the Debtors have is to keep spending the money of *depositors* to keep paying themselves for as long as possible (with our money). The fact that the UCC; who is supposed to be advocating for the best interests of the creditors, is actively delaying/blocking motions that I filed, while claiming to be acting in our best interests is insulting. The UCC is *potentially* directly breaching their fiduciary duty by delaying clawbacks and cost cutting measures, they (along with other advisors/consultants/legal counsels) may be negligent.

Waiting to begin clawbacks will hurt creditors. Should huge amounts of assets be dissipated while the UCC dithers, as I have warned that they will be in this motion, and their failure to act is now in the court record, and they are on notice that they can be held liable in the future for damages by the estate. If the UCC choses to wait to begin clawbacks, they must explain how waiting to even ***begin*** clawbacks could possibly result in a better recovery for depositors. It is a simple question that the UCC should answer in any reply to this motion. If they do not, they should come to court ready to answer the question. If they cannot answer it, it says all that this court needs to know.

The Debtors and UCC have constantly claimed that they are working in the best interests of the creditors, being “open and honest”, having “transparency” and actively working to cut costs, and investigate insider clawbacks. Unfortunately, for the past four months, the creditors (and the court) have heard a lot of promises, but have not seen much in the way of results. To date (October 24th, 2022) there has yet to be a single action commenced to clawback any assets (other than the assets very likely stolen by Jason Stone, of which about \$300,000,000 are still missing). There have also not been *any* significant cost cutting measures, to the contrary, it seems that the estate is spending more than ever with all kinds of consultants, lawyers, and advisors being paid, in addition to the wasteful spending coming from the mining business and paying salaries/benefits to employees/executives and insiders. The Debtors even have the audacity to ask the court to be allowed to pay more depositor funds to retain, as they say “key employees”, when they should be firing the vast majority of the staff, not giving them bonuses. Certain insiders which withdrew assets with insider knowledge continue to receive payments from the estate, the Debtors and UCC have not even taken the most basic of steps to pay those payments into a separate account to use it to offset the dissipated funds. For months, the Debtors and UCC have made claims, and promises, but as the saying goes, actions speak louder than (~\$2,000 per hour) words.

MY INITIAL INSIDER CLAWBACKS PROPOSAL

I believe, following analysis, that the preferential payments made in the past year (at a time when Celsius was very likely already insolvent and the standard for insider clawbacks) likely *do* constitute property of the bankruptcy estate, and that you can rule this from the bench at

the hearing with no additional information needed except what is in this motion and in the court record.

Any assets withdrawn by insiders (and anyone else with non-public information) in the past year should therefore have clawbacks begin immediately.

Although I am eager to get started on clawbacks going back further than one year, I accept that we have to wait for additional information about the Debtor's insolvency to start on them. This compromise will not please all Creditors, and it doesn't please me, but it is a start to take practical steps to bring money back into the estate on an emergency basis, as much of as is we can, before more of it is dissipated.

There is quite a bit of disagreement in the "Celsius Community" about clawbacks of so-called preferential payments. Some want it to target every single retail customer dollar withdrawn from Celsius in the 90 days leading up to the bankruptcy above the statutory threshold of \$7,575 (which would be an extremely wasteful of resources and time). Others want more limited clawbacks from only insiders, large so called "whales"⁶ and institutions such as Tether. Almost everyone can agree, however, that insiders and anyone with non-public knowledge of the insolvency/upcoming closure of withdrawals, should be forced to return the assets, and any and all interest/gains/profits made from the assets (such as rewards for "staking."⁷). In addition, insiders should compensate the estate for any costs associated with pursuing them for the preferential payments.

⁶ A term used in the crypto community to describe holders with large amounts of crypto.

⁷ Some coins, like ETH are able to be "staked" to effectively earn interest for locking up the coins.

According to *Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy* filed by the Debtors, many insiders, including Alexander Mashinsky and his family (along with other insiders such as the Co-Founder, and various high ranking executives), withdrew tens of millions of dollars in the days leading up to the bankruptcy filing. Clearly, this was done based on insider, non-public information (all the while, Alexander Mashinsky was telling everyone, including on Twitter, that everything was fine and there are no issues with withdrawals). These clearly constitute preferential payments and **must** be returned to the estate **on an urgent basis.**

DISSIPATION OF FUNDS/POTENTIAL MONEY LAUNDERING

It is quite shocking to me that no one has yet recommended to the court that clawbacks be carried out against insiders. Cryptocurrency is an extremely difficult asset to recover. Unlike fiat currencies (such as the US dollar) there are no centralized entities that can be ordered to either reverse transactions or freeze funds (assuming the person attempting to hide the assets takes even basic steps to prevent them from being seized).

There is already large amounts of clear evidence⁸ that at the very least some funds⁹ have already been dissipated. And as recently as September 19th, 2022, more “CEL” tokens have been moved into wallets which have been used to sell it through a decentralized exchange (DEX).

⁸ <https://www.arkhamintelligence.com/reports/celsius-report> this report by Arkham labs, which came out prepetition, and was backed up by information which (months later) came out during the bankruptcy process.

⁹ Various internet sleuths have done chain analysis which shows that the Mashinsky's have been selling various tokens (which, it should be noted, do **not** belong to them since they are property of the estate) continuously. <https://twitter.com/MikeBurgersburg/status/1571882204682141696>
<https://dirtybubblemedia.substack.com/p/the-mashinskys-keep-celling-out>

On August 29th, 2022, approximately \$35,000 worth of “CEL” tokens were exchanged for USDC (a stablecoin pegged 1-1 to the US Dollar) and ETH. There is a potential risk of the dissipation of funds from the wallets held by the Debtors, within the past 60 days (which is after the bankruptcy filing), funds have been moved from Celsius Wallet 10¹⁰, to a unknown wallet. I do not recall seeing any court authorization for that. I suggest that at least one so-called signers on any wallet holding assets of the estate

It should be noted that Celsius purchased *hundreds of millions* of dollars worth of “CEL” before and **after** “The Pause” on withdrawals. This qualifies as embezzlement against the estate under 18 USC § 153 in my opinion, Your Honor; they created liquidity with depositors assets for “CEL” (which, on its own, would not have any liquidity since it effectively only existed because Celsius propped it up), and then they used that liquidity to profit by selling “CEL” tokens (which, again, they should not have because everything they withdrew is property of the estate). Even now¹¹, as wallets linked to the Mashinsky’s are selling large amounts of “CEL” tokens. Almost 200 million¹² “CEL” tokens passed through known¹³ wallets of the Mashinsky’s, the all time high (ATH) price of “CEL” was \$8.05¹⁴. This is only an example of *one* insider. It is highly likely that other insiders have done the same. And this is only an example of what is known, on a transparent, public ledger blockchain. There also needs to be an investigation on what happened on Centralized exchanges, such as FTX, where Celsius transferred \$320 million before bankruptcy; if those funds were used to provide liquidity for CEL token, or any other improper

¹⁰ <https://etherscan.io/address/0x917334942eee7c32dcccfbde975f3e0ac30efac4>

¹¹ As of 10/10/2022

https://twitter.com/coffeebreak_YT/status/1579641990228373505?cxt=HHwWgsDTvagBguwrAAAA

¹² See: <https://dirtybubblemedia.substack.com/p/hodl-for-thee-but-not-for-me> also see Exhibit C.

¹³ And it is likely that there are more wallets which are unknown that are under their and other insider's control.

¹⁴ According to *CoinGecko*, a website/app which tracks over 10,000 cryptocurrencies.

transactions, they need to be traced and recovered.¹⁵ As well as the approximately \$300 million worth of crypto which was moved to unknown wallets in the days leading up to the bankruptcy filing.

At the 341 hearing on October 13th 2022, current CEO Chris Ferraro (who happens to be located in Belize, which regularly ignores/refuses US extradition requests) admitted that Krissy Mashinsky received regular payments from Celsius¹⁶. That is a clear example of theft, there is no reason that she should have been getting paid. If the CEO of Goldman Sachs (or any other financial institution) paid their wife large sums of money, and bought stuff from his wife's business, using their client's assets, they would be indicted and arrested instantly. Just because crypto is less regulated, does not make fraud and theft suddenly not **illegal**. All of those payments must be clawed back with interest + any gains made with those payments.

Daniel Leon's (a co-founder of Celsius) connection to Alchemy capital must be investigated. And if it is found that it was used as a way to siphon (depositor's) money out of Celsius, it must be clawed back, and criminal charges should be filed.

At the same 341 hearing, it has also come out that before May, Celsius had **no** policy for its corporate credit card/expensing stuff. This should also be investigated, and once fraud is inevitably found, it should then be clawed back, and criminal charges should be filed¹⁷.

¹⁵ <https://cases.stretto.com/public/x191/11749/PLEADINGS/1174910032280000000095.pdf> this filing by Alexander Peter Simmons discusses issues with FTX Exchange and CEL token

¹⁶ <https://twitter.com/SimonDixonTwitt/status/1580568561508286465>

¹⁷ <https://twitter.com/SimonDixonTwitt/status/1580567619387604993>

MONERO AND PRIVACY COINS CREATE AN URGENT SITUATION

If someone wanted to truly hide assets that would be completely untraceable to anyone, including the US Government and Federal investigators, they would use a privacy coin called “Monero¹⁸” (ticker symbol XMR).¹⁹

All transactions made with Monero are 100% private and anonymous, it is impossible to see anyones account balance, or anything. It is also possible to do a so called “atomic swap²⁰” (which, basically is a way to exchange Monero to another cryptocurrency like BTC or ETH without the use of any exchange, centralized and decentralized), which is also untraceable (at least on the Monero side of it).

Various US government agencies like the IRS have offered large cash bounties to crack Monero (it is still unclaimed after over 2 years). Even if someone developed a way to track XMR, the developers will/can “fork” it (change the code to make it untraceable again). It is **imperative** that insider assets are retrieved as soon as possible, because with cryptocurrency, it is possible to hide billions of dollars worth of assets in a matter of minutes.

RISK OF ASSETS LEAVING US JURISDICTION

Cryptocurrency is an asset that is extremely easy to move outside of this courts (and the entirety of the United State’s jurisdiction). To the best of my knowledge, some assets are already outside of the reach of US jurisdiction. The Co-Founder of Celsius, Mr. Leon, is in Israel (there

¹⁸See: <https://leofinance.io/@forexbrokr/is-monero-traceable-in-2021>

¹⁹ <https://prohashing.com/blog/the-value-of-a-celsius-bankruptcy-claim>

²⁰ <https://www.getmonero.org/2021/08/20/atomic-swaps.html>

is a risk that the Israeli authorities do not cooperate, like they sometimes do not cooperate) he may decide to not cooperate²¹.. The same risk exists for Mr. Alexander Mashinsky and his family. He has Israeli citizenship, so he may decide to flee the country (to avoid potential criminal charges/large amounts of civil lawsuits) it should be noted that Israel does not extradite their own citizens. Cryptocurrency can be moved to the other side of the world in mere *seconds*, and there is nothing anyone can do to stop it. There is an **extreme** risk of even more assets disappearing/dissipating and/or simply being spent, and that is why it is crucial to order these clawbacks to begin as soon as possible.

NFTs

Another way to launder/hide assets is through NFTs (Non-Fungible Tokens²²). It is basically a unique picture (or artwork) that is stored on the blockchain. NFTs are perfect for laundering crypto because some NFTs sell for millions of dollars²³. It will be extremely hard if not impossible to identify genuine NFT sales from NFT sales that are used for laundering money. According to Arkham Labs²⁴, “0xB1” (who at one point was given control of almost \$2 billion of Celsius’s assets) bought numerous NFTs for millions of dollars, most of which are still missing. According to Arkham labs: “Additionally, many of the NFTs are still unaccounted for. Despite spending 3,535²⁵ ETH on NFTs, 0xB1 only ever sold 76 ETH worth of said NFT”. The same thing could easily happen with the withdrawn assets.

²¹ I am not saying that he will not, or that he is engaged in any sort of illegal (other than the preferential withdrawal related acts) activities, just that it is a possibility.

²² <https://www.idnow.io/blog/nft-non-fungible-tokens-new-art-money-laundering/>

²³ One sold for almost \$70,000,000:

<https://nftnow.com/features/most-expensive-nft-sales/#beeple-everydays>

²⁴ <https://www.arkhamintelligence.com/reports/celsius-report>

²⁵ As of October 9th, 2022, the difference between the purchase price and sales price is almost \$4,500,000. At ETH’s all time high price, that is approximately \$17,000,000 “loss”.

I wouldn't be surprised if the laundering of money through NFTs has already happened. The ease at which money can disappear with cryptocurrency is terrifying, and it will significantly harm creditor's recovery.

OTHER POTENTIAL MONEY LAUNDERING AVENUE'S

Krissy Mashinsky (Alexander Mashinsky's wife) has a company called USA Strong. It may be a front for money laundering, and should be looked into. What we do know is that NFTs (which were purchased with depositor funds) were sent to the USA Strong Wallet from 0xB1 (the same person/entity who ended up losing Celsius approximately \$400 million). According to the Financial Times:²⁶

Interestingly, on June 7, 2021, weeks after the termination of Celsius' and 0xB1's relationship, the 0xB1 wallet transferred three "Meme Ltd." NFTs to the Ethereum address "usastrong.eth." USA Strong is the business of Celsius CEO Alex Mashinsky's wife, Krissy Mashinsky. This wallet belongs to her.

We do know that they sell some amount of real merchandise from internet reports. Still, there is also the evidence (above) that it *may be* a front for money laundering via NFTs. Any sales of NFTs that were once in insider wallets need to be traced and the proceeds found and clawed back. This store also has very poor online reviews, which *may* indicate that it is more of a front²⁷, then a legitimate business. And, they are selling an "UnBankrupt Yourself" shirt²⁸, which *may* be more to taunt customers (similar to the way Mrs. Mashinsky taunts Celsius

²⁶ <https://www.ft.com/content/773a963a-e6d0-415f-bf0a-8f3fcc8022c3>

²⁷ <https://www.trustpilot.com/review/usastrong.io>

²⁸ See: Exhibit A

customers on Twitter) rather than sell anything. This is especially disturbing in light of the fact that Krissy Mashinsky seems to have withdrawn essentially everything from her wallet, while telling the community “I’m a creditor too.”

As I have shown, USA Strong and Krissy Mashinsky should be looked into, since these actions are all a *potential* way for (what effectively is stolen) money to be **laundered**, or, at a minimum, embezzlement against estate under 18 USC § 153 (USA Strong’s wallet²⁹ has sold “CEL” tokens which were withdrawn from Celsius—using insider information of the solvency issue—and NFTs that came into and out of its wallet need to be looked into.) Any and all assets that were diverted from Celsius’s depositors/withdrawn based on insider information, and proceeds from those assets/the current value of them *must* be returned to the estate **immediately**.

During the 341 hearing on October 13th, 2022, the current CEO admitted that Celsius purchased merchandise, including shirts and board games from USA Strong (Krissy Mashinsky’s company). The merchandise was bought with what is effectively depositor funds. They must be clawed back immediately. This is clear embezzlement and potentially money laundering.

REQUEST FOR RELIEF

1. I ask that Your Honor approves my motion and orders the UCC and/or US Trustee to begin immediate clawbacks for funds withdrawn by Alex and Krissy Mashinsky and other known insiders at the November 1st hearing.

²⁹ <https://twitter.com/MikeBurgersburg/status/1571882204682141696>

2. I ask the the Debtor and Kirkland and Ellis be required to file, with this court, a schedule of all NFTs that have ever been inside of Celsius-owned wallets and the wallets of insiders, along with the current wallet each NFT resides in today, the original purchase price of each NFT, the address the NFT was bought from, the address the NFT resides in today, and each NFTs current estimated value. Each NFT, like a piece of fine art, must be treated as a separate piece of property by the debtor; they could have significant value into the millions of dollars or more. Each NFT requires close scrutiny and tracing of each individual transaction due to money laundering issues. As I mentioned, it is easy to make money “disappear” from the estate via NFTs and each NFT transaction must be deeply examined and scrutinized.
3. I ask that this court order Alex Mashinsky to immediately cease and desist from selling “CEL” tokens. He is continuing to dump “CEL” tokens right now³⁰, as I write this motion. He and his wife should also be ordered to immediately cease the transfer, conversion, sale and dissipation of all cryptocurrencies, NFTs, and anything that was (including cars, houses, stocks, bonds, commodities, etc) purchased using funds withdrawn from Celsius based on non-public information, or is otherwise ill gotten.
4. I ask that the court direct the Examiner (since the UCC seems to be actively delaying/preventing clawbacks) to investigate whether Celsius’ insolvency extends back more than 1 year (from when they paused withdrawals on June 12th, 2022) at the November 30 hearing (like the report issued by Vermont and the other states suggests it does), and that they come back to this court by the November 30 hearing with a plan to

³⁰ See Exhibit C.

deal with insider/preferential (to include anyone who has had non-public information) payment clawbacks (including transfers from “Earn” to “Custody” accounts) going back further than 1 year.

5. I also ask that Your Honor orders the UCC/US Trustee and the Debtors to formulate a plan to clawback *all* large withdrawals by accredited investors/so called “whales³¹” and institutions, and present it at the hearing following the November 30 hearing.
6. I ask that Your Honor order the clawbacks of assets from the list that will be presented at the November 30 hearing.
7. I ask that Your Honor orders any and all assets, cryptocurrencies, cash, and anything that is recovered via clawbacks is unable to be sold, transferred, dissipated, converted, or used without court approval, pending a full hearing process. The Debtors should not be able to spend any and all assets (and anything of value), including cash, for expenses, to pay fees of any sort or to dissipate it in any way (yet). The assets/cash/cryptocurrency/everything recovered should be added to the estate (unless it is a liability, then of course, the estate³² does not need anymore liabilities). I expect the Debtors to attempt to use the funds clawed back to help fund their horribly inefficient and expensive upkeep, this should not be allowed (for more information, see my motion on cost cutting).

³¹ A term used in the crypto community to describe holders with large amounts of crypto.

³² But **not** declared property of the estate, and that it is treated as all other creditors' property is.

8. I ask that the court **not** approve any (further) expenses and dissipation of funds from the estate; to any and *all* consultants, advisors, **legal counsel**, etc, until *after* the wrongfully withdrawn funds have been **fully** returned. It *may* very well be **malpractice** for Kirkland and Ellis to know about the insider withdrawals and do *nothing* about it for the approximately 4 months they have been working for Celsius/the bankruptcy estate.
9. I ask that the court order the US Trustee/Examiner to investigate the actions of the Debtors and the UCC, and find out why both of them have been so hesitant to cut costs and commence clawbacks. I am sure that both of them will claim otherwise, but actions speak far louder than words.
10. Various reports (such as the Vermont report), and onchain analytics showed that Celsius has been buying large quantities of “CEL” tokens for years (with depositors assets). Some of these purchases took place after the “Pause” on withdrawals, those, and any purchases made within the period of insolvency should be clawed back. That includes from both the exchange itself, and the parties who sold the “CEL” to Celsius (which are mostly insiders). This is a unorthodox approach, and I believe it will allow **hundreds of millions of dollars** to be returned to the estate. Alternatively, a deal with the crypto industry as a whole (with companies such as Binance, FTX, Coinbase, Gemini, Tether, etc) could be reached, to not clawback assets from exchanges/various protocols/decentralized networks such as Bancor, in exchange for them paying them compensating the estate.

I also ask that the court considers appointing a Chief Restructuring Officer if the Debtors **continue** to be unable to properly fulfill their *fiduciary* duties, and reserve the right to file a Motion for the Appointment of a Trustee if cost-cutting measures, and clawbacks are not instituted immediately.

Signed:

/s/Daniel A. Frishberg

Daniel A. Frishberg, *Pro Se*

October 25th, 2022

Hillsborough County, Florida.

Exhibit A:

usastrong.io/search?q=unbankrupt+yourself

unbankrupt yourself More than 15000 products to choose from

by State Graphic Tees Women Men Home Beauty Self Care Wellness Food & Wine Great Outdoors American Vintage About Us StrongTV Get Verified

Share: p f t

found for "unbankrupt yourself"


Search Results for "unbankrupt yourself"

unbankrupt yourself

Showing 3 results for "unbankrupt yourself"


Relevance

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\$29.00

Unbankrupt Yourself T-Shirt



\$29.00

Unbankrupt Yourself T-Shirt - White



\$29.00

Unbankrupt Yourself T-Shirt - Heather Black

Exhibit B:



Exhibit C:

0xa176c0cd8207609c5f0...	2022-10-11 1:06:11	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,857.125015	USD Coin (USDC)
0xa176c0cd8207609c5f0...	2022-10-11 1:06:11	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)
0xd691e325c7ce9aac05...	2022-10-11 0:00:47	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,867.037514	USD Coin (USDC)
0xd691e325c7ce9aac05...	2022-10-11 0:00:47	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)
0xb527d89f1bcc924ac63...	2022-10-10 23:11:23	Arbitrum: Bridge	IN	Mashinsky Cashout Wallet	738.097	ERC-20: Rf.....net
0x8eb2a627c19300f4e8...	2022-10-10 21:28:23	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,927.409276	USD Coin (USDC)
0x8eb2a627c19300f4e8...	2022-10-10 21:28:23	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)
0xfd821e27fe32eea5df0...	2022-10-10 20:26:47	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)
0xfd821e27fe32eea5df0...	2022-10-10 20:26:47	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,958.728149	USD Coin (USDC)
0x5534a456ff648fee0b9...	2022-10-10 19:50:11	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)
0x5534a456ff648fee0b9...	2022-10-10 19:50:11	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,956.25	USD Coin (USDC)
0x117171f97047ae7f467...	2022-10-10 19:02:35	0x74de5d4fcbf63e00296...	IN	Mashinsky Cashout Wallet	4,985.987501	USD Coin (USDC)
0x117171f97047ae7f467...	2022-10-10 19:02:35	Mashinsky Cashout Wallet	OUT	0x74de5d4fcbf63e00296...	5,000	Celsius (CEL)

Exhibit D:



Zach
@Zach_HODL_ON

...

Again another bad faith attack 🙄

Remember all of the shirts and various SWAG that was given to thousands of people in events all over the world? @usastrongIO was the vendor for all of that merch.

@TiffanyFong_ how is @CelsiusNetwork buying this merch a scandal?



Tiffany Fong @TiffanyFong_ · 3h

Lol soo @CelsiusNetwork was purchasing @KrissyMashinsky's @usastrongIO merch for employees & giveaways with... our funds? 🤔 jfc @mashinsky.

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